

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

UNITED STATES OF AMERICA)	
)	
v.)	Case No. 3:20-CR-00165
)	Judge Campbell
CALEB D. JORDAN)	

MOTION FOR ENTRY OF A CONSENT PRELIMINARY ORDER OF FORFEITURE

Pursuant to Rule 32.2 of the Federal Rules of Criminal Procedure and 18 U.S.C. § 2253(a), the United States of America moves for entry of a Consent Preliminary Order of Forfeiture of Defendant Caleb D. Jordan's interest in:

- (1) any visual depiction described in 18 U.S.C. § 2251 or any book, magazine, periodical, film, videotape or other matter which contains any such visual depiction which was produced, transported, mailed, shipped or received in violation of law;
- (2) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offenses; and
- (3) any property, real or personal, used or intended to be used to commit or to promote the commission of such offenses or any property traceable to such property;

including, but not limited to, electronic devices seized from the residence of Defendant, located on Ridgerview Drive in Mt. Juliet, Tennessee, on or about April 18, 2020, including, but not limited to, the following:

- a) an Apple iPhone XR;
- b) a Samsung laptop model NP530E5M;
- c) a PNY thumb drive (32G);
- d) a Sandisk Cruzer Glide thumb drive (64G);
- e) two silver/black thumb drives (1G);
- f) a red thumb drive (32G); and

g) a Sandisk red/black thumb drive labeled High Cotton (8G)
(collectively "Subject Property"). *See* Fed. R. Crim. P. 32.2(a), (b)(1)(A), (b)(2), and (c).

In support thereof, the Defendant has pled guilty to a violation of 18 U.S.C. §§ 2251(a) and (e) as charged at Count Six of the Indictment, and he was placed on notice of the intention of the United States to seek forfeiture in the Forfeiture Allegation of the Indictment. (ECF No. 20: Indictment.) Pursuant to the plea in this matter, the Defendant has admitted facts demonstrating nexus of the Subject Property to the offense of conviction. (ECF No. 87: Order Accepting Plea Petition; ECF No. 88: Plea Agreement.) The Defendant has had an opportunity to be heard on the forfeiture, acknowledges that the Subject Property is property used or intended to be used to commit or to promote the commission of a violation of 18 U.S.C. §§ 2251(a) and (e), and he further agrees that the Subject Property had a substantial connection to the crimes of conviction. (*Id.*) The Subject Property is, therefore, forfeitable to the United States pursuant to 18 U.S.C. § 2253(a).

A proposed Preliminary Order of Forfeiture is attached hereto for the Court's convenience.

Respectfully submitted,

HENRY C. LEVENTIS
United States Attorney for the
Middle District of Tennessee

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CERTIFICATE OF SERVICE

I hereby certify that on this 3rd day of July 2023, a copy of the foregoing Motion for Entry of a Consent Preliminary Order of Forfeiture and proposed Consent Preliminary Order of Forfeiture was filed electronically. Notice of this filing will be sent to Kathleen G. Morris and Jodie A. Bell via email by operation of the Court's electronic filing system.

By: s/ S. Carran Daughtrey
S. CARRAN DAUGHTREY